

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:
Orly Zeewy	:
	:
Debtor	: Chapter 13
	:
Orly Zeewy	: Bankruptcy No. 20-11595 AMC
	:
Movant	:
v.	:
	:
Wells Fargo Bank, National Association as Trustee	:
for Abfc 2006-Opt3 Trust, Asset Backed Funding	:
Corporation Asset-Backed Certificates, Series	:
2006-Opt3	:
	:
Respondent	:
	:

**RESPONSE OF WELLS FARGO BANK, NATIONAL ASSOCIATION AS TRUSTEE
FOR ABFC 2006-OPT3 TRUST, ASSET BACKED FUNDING CORPORATION ASSET-
BACKED CERTIFICATES, SERIES 2006-OPT3 TO EXPEDITED MOTION FOR
AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND
ENCUMBRANCES**

Respondent, Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3, by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment
5. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment

6. Admitted.
7. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment
8. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment
9. Conclusion of law.
10. Admitted.

WHEREFORE, Respondent, Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3 respectfully requests that this Honorable Court deny EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES in its entirety without the following provision:

- 1) Debtor shall include in the Order that either **Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3** will be paid in full subject to a proper payoff quote at the time of closing or that any sale short of full payoff will be subject to **Wells Fargo Bank, National Association as Trustee for Abfc 2006-Opt3 Trust, Asset Backed Funding Corporation Asset-Backed Certificates, Series 2006-Opt3's** final approval.
- 2) Closing is required within 30 days of the payoff quote date or a new payoff is required within 30 days of closing.

Respectfully submitted,

Date: July 6, 2020

/s/ Jerome Blank, Esquire
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